

# **Klein Decl. Exhibit 36**

1 UNITED STATES DISTRICT COURT  
2 MIDDLE DISTRICT OF NORTH CAROLINA  
3  
4

5 ZION WILLIAMSON CIVIL ACTION NO.  
6 VERSUS 1:19-CV-00593-LCB-JLW  
7 PRIME SPORTS MARKETING,  
LLC AND GINA FORD  
8  
9

10 VIDEOTAPED DEPOSITION OF LEANDER (LEE) ANDERSON,  
TAKEN AT THE ROOSEVELT NEW ORLEANS, 130 ROOSEVELT  
11 WAY, NEW ORLEANS, LOUISIANA, ON THE 9TH DAY OF  
DECEMBER, 2021, COMMENCING AT 9:02 A.M. AND  
12 CONCLUDING AT 7:00 P.M.

13  
14  
15 REPORTED BY:  
16  
17 RUBY M. WALLEN  
CERTIFIED COURT REPORTER  
18  
19  
20  
21  
22  
23  
24  
25

1 A. Yes, sir.

2 Q. And you guys looked at it and talked  
3 about it. Right, sir?

4 MR. KLEIN:

5 Objection. Foundation.

6 THE WITNESS:

7 They went over it. They went over it.

8 Yes.

9 BY MR. DRUMMOND:

10 Q. Did you ask questions?

11 A. I listened to their presentation.

12 Q. The question to you was: Did they ask  
13 you questions?

14 A. I don't think they asked questions.

15 They just went over what was in the book.

16 Q. Did you ask questions?

17 A. No.

18 Q. What about your wife?

19 A. My wife wasn't there.

20 Q. It was just you?

21 A. Yes.

22 Q. Okay. And did you ask for a copy of  
23 that plan after you left that meeting?

24 A. They gave me a copy. I didn't ask for  
25 it.

1 Q. Did you give it back to them?

2 A. No.

3 Q. You left with it?

4 A. Yes.

5 Q. Okay. Now, I'm showing you that which  
6 is marked as Williamson K. And, Mr. Klein, take a  
7 look, please.

8 MR. KLEIN:

9 Okay.

10 BY MR. DRUMMOND:

11 Q. Okay. Now, before we do, let's just  
12 go through the remaining exhibits and just read them.  
13 I think that will set the background for the  
14 communication. If you go to Bates number -- just  
15 review 304, 303, 302, 301, 300, 299, 298 and 297. If  
16 you could quickly review those for me, sir.

17 Do you see what I'm talking about?

18 A. What page are you stopping at, you  
19 said?

20 Q. The last one. Yeah.

21 MR. KLEIN:

22 I think he wants you to read it all  
23 the way through, each page to the end.

24 BY MR. DRUMMOND:

25 Q. Yeah.

1 Q. The first one I'm looking at, it is  
2 dated May 25th, 2019 at 3:06 P.M. and it has a "From"  
3 line. Is that you, the "From"?

4 A. From, okay. Yes. "Hope all is well.  
5 Let me know when the wire" -- oh. He evidently told  
6 me he was going to wire it at a certain time. I just  
7 told him, let me know when he's done it.

8 Q. Okay. When you say, well, let me know  
9 when the wire is done, what wire are you referring  
10 to?

11 A. Well, he was talking about the money  
12 that he, you know, insisted. The money that he  
13 mentioned to us that they normally do when they sign  
14 people, you know, to whatever account.

15 Q. This now is in May, you know, sir.  
16 I'm talking about --

17 A. Oh.

18 Q. -- May 25th. Is that the money from  
19 Hobbs & Shaw?

20 A. Hobbs & Shaw, then, that is what that  
21 is. Yes.

22 Q. Now, you said you were alluding to  
23 earlier on, \$100,000 was sent. Is it your testimony  
24 that Mr. Luchey in April of 2019 insisted on sending  
25 you \$100,000 at the signing of Zion Williamson?

1       A. Yeah. He made the comment to us. He  
2 suggested to us that that's what they do for their  
3 clients when they sign clients.

4       Q. So is it your testimony here that you  
5 were not the one who initiated getting \$100,000?

6       A. Definitely not.

7       Q. And it is Mr. Luchey who insisted on  
8 saying, now we are signing, why don't we give you  
9 \$100,000. That is your testimony?

10      A. That is customary, what he said. He  
11 said, this is a customary thing. And, you know, when  
12 we sign people, we give them, you know, an advance  
13 on, you know, whatever. You know, his clients. Hey,  
14 that's what he told me.

15      Q. I want to make sure we are clear on  
16 that.

17      A. Yes.

18      Q. Mr. Luchey on or about April 20th at  
19 the signing of Zion Williamson in your home, in North  
20 Carolina, insisted on giving you and sending to Zion  
21 Williamson \$100,000, sir?

22      A. Maybe insisted is not the proper term.  
23 But he said -- not in the home, no. It wasn't in our  
24 home. We were in our car. And he was sitting in the  
25 front seat -- I think front seat or back seat. One

1 of them. But he turned to me and said, hey, listen.  
2 Now that we got all this behind us, it is customary  
3 that we give our clients, you know, some funds to  
4 operate off of. You know, you have a lot to do  
5 coming up. We give our people some funds to operate  
6 off of. That came strictly from Andrew Luchey.

7 Q. I understand. I want to make sure we  
8 have the context of it right.

9 A. Yeah.

10 Q. So you are sitting in your car in the  
11 back and you didn't bring up any money regarding --

12 A. No.

13 Q. -- finances. Right, sir?

14 A. No. I didn't.

15 Q. And at this point, it is your  
16 testimony that they already had signed Zion  
17 Williamson. Right, sir?

18 A. I would assume. I mean, it would have  
19 to be, because that is when he said it. Yes.

20 Q. So the signing had already taken place  
21 in your home. Right, sir?

22 A. Yes.

23 Q. And while you were in your home, no  
24 money was mentioned. Right, sir?

25 A. No, sir.

1 information regarding how that money should be wired  
2 to you, sir?

3 A. Before Mr. Luchey left. Yes. He told  
4 me to send him the information, whatever the  
5 information was.

6 Q. So we are clear as to this point. It  
7 is your testimony here under oath that at no point  
8 did you, your wife, Mrs. Anderson or Zion Williamson,  
9 ask for any money?

10 A. Correct.

11 Q. And this was all suggested by Mr.  
12 Andrew Luchey to the tune of \$100,000?

13 A. Correct.

14 Q. Okay. So going back to the exhibit  
15 that is before you.

16 A. Uh-huh.

17 Q. May 25th, you are asking about the  
18 money from Hobbs & Shaw, sir?

19 A. Yes.

20 Q. Okay. How much money was that?

21 A. To tell you the truth, I can't  
22 remember what it was.

23 Q. Do you know, was that money now money  
24 to be received from Hobbs & Shaw based upon the work  
25 that was performed in California?

1 no. So let's move on.

2 THE WITNESS:

3 Let me answer that. Yeah. I said no,  
4 because Gatorade came to us. We met Gatorade long  
5 before this right here.

6 BY MR. DRUMMOND:

7 Q. How long ago had you met Gatorade?

8 A. During the basketball season at Duke.

9 Q. When was that?

10 A. Right at the end of the season.

11 Q. So about what month was that, sir?

12 A. February, early March probably.

13 Q. Okay. So I'm talking about now, Miss  
14 Metelus' role.

15 A. Yeah. I understand, but all this --

16 Q. Let me finish the question.

17 A. Okay.

18 Q. Miss Metelus now. I'm not saying you  
19 didn't meet Gatorade before.

20 A. Okay.

21 Q. I'm asking about when Miss Metelus  
22 sent this E-mail, was that an opportunity you think  
23 she was advancing regarding getting Zion Williamson,  
24 you and your wife, to meet the people from Gatorade  
25 that they have marketing relationships with?

1 A. All right.

2 Q. I'm only asking you now what words  
3 came out of your mouth?

4 A. About what?

5 Q. About when you received this  
6 communication, May 23rd, 2019, you were actually at  
7 the Hobbs & Shaw shoot with Miss Ford there?

8 A. Okay.

9 Q. Is that right?

10 A. Yes.

11 Q. And Miss Ford was the one, based on  
12 that Exhibit B, that brought in the Panini deal from  
13 May 5th, 2019. Right, sir?

14 A. Okay. To your recollection, you  
15 thought she -- she didn't bring that in. She  
16 probably went and pursued that. But Panini was  
17 talking to me long time before that, sir. We already  
18 had the relationship with Panini. That was  
19 something -- so Miss Ford can't even take credit for  
20 that.

21 Q. So look at the -- I want you to read  
22 the May 23rd, 2019.

23 A. I'm looking at it. I'm looking at it.

24 Q. Just read the top part into the  
25 record.

1 A. No. I'm not suggesting that.

2 Q. You are not disputing that Miss Ford  
3 did that? Are you doing that, sir?

4 MR. KLEIN:

5 Objection. Foundation.

6 THE WITNESS:

7 The relationship was already  
8 established. Whatever happened happened.

9 BY MR. DRUMMOND:

10 Q. My question is: You are not disputing

11 --

12 A. No. I'm not disputing.

13 Q. So let me be clear. You are not  
14 disputing that on or about May 5th, during that time  
15 period, Miss Ford, Exhibit B that I showed you very  
16 early this morning, she was the one who negotiated  
17 that. You are not disputing that?

18 A. I questioned it.

19 Q. So, well sir, let me understand this.

20 MR. KLEIN:

21 Stephen, could let him finish his  
22 answer. He didn't interrupt you. You don't  
23 interrupt him.

24 BY MR. DRUMMOND:

25 Q. No. That's okay. Go ahead. You

1 questioned --

2 A. No. I'm saying that deal could have  
3 come whether Miss Ford was there or not. Sir, Zion  
4 was the number one player in the draft. He was high  
5 profile. That was basic stuff. That number that  
6 came in, that 1.5, don't be misled that Miss Ford did  
7 this. These numbers were coming from everybody.

8 Q. What I'm asking you again, sir, is  
9 this: You are not disputing that Miss Ford was the  
10 one who negotiated that deal that is in Exhibit B?

11 A. I'm not disputing it. But I'm  
12 questioning, you know, whether that actually, it  
13 happened like that. I don't go with that.

14 Q. You are not going to credit it is what  
15 you are saying?

16 A. Well, you could call it whatever you  
17 want, sir.

18 Q. So would it be fair to say, as you sit  
19 here now, you wouldn't credit any deal that she did.  
20 Right, sir?

21 A. Which deal did she do that I need to  
22 give credit to?

23 Q. No. You don't get to ask the question.

24 A. Oh.

25 Q. I'm just saying, as you sit here